

TABLE 2
CPNI IN REPORTS (page 3 of 6)

<u>REPORT/DATA EXTRACT</u>	<u>GUIDELINES/SUGGESTIONS</u>
<p>Summary data on all customers in an identified class, segment, or category of USWC customers or products, at a central office level, e.g., product penetration, feature usage, calling activity. Such a sum would be <u>inclusive of all customers</u> in that class, segment, category, regardless of CPNI status.</p>	<p>This is <u>aggregated</u> CPNI. Requests from "enhanced services/CPE" personnel must be placed with the Vendor Service Center and ultimately with the USWC CPNI Compliance Manager for review and decision. The request <u>must be approved prior to</u> aggregation of the data, and must be available to non-affiliated providers <u>at the same time</u> it will be available to USW personnel.</p>
<p>OTHER:</p> <p>Analyses of product revenues, growth, market share, etc., for "enhanced services/CPE" employees.</p>	<p>Only <u>unrestricted</u> CPNI may be used for these analyses, if developed for enhanced service/CPE planning, marketing or sales purposes. Company systems/databases/PCs may be used <i>if an auditable trail is created to verify that the data and analyses were derived from <u>unrestricted</u> customer record information.</i></p>
<p>Customer record information for market management purposes.</p>	<p>Market managers conducting analysis for enhanced service/CPE products or product managers may only use <u>unrestricted</u> USWC customer records. Market managers who conduct such work will be considered "enhanced service/ CPE" market managers, and must limit use of internal data to <u>unrestricted</u> accounts for <u>all</u> projects.</p>

TABLE 2
CPNI IN REPORTS (page 5 of 6)

REPORT/DATA EXTRACT	GUIDELINES/SUGGESTIONS
<p>SHARING INFORMATION WITHIN USW:</p> <p>Sharing of USWC customer record information with other U S WEST companies, e.g.:</p> <p>Market Resources Group (MRG) NewVector Enhanced Services Inc. (ESI) Multimedia Communications Group (MCG) (In U S WEST, Inc.)</p> <p>USWC will not provide customer CPNI to Time Warner Entertainment or other joint ventures without customer authorization to do so. These are not wholly owned U S WEST entities.</p>	<p>Under our approved ONA plan, we may share unrestricted customer records with our affiliated companies* that plan, market, and sell enhanced services (except NewVector). <i>If those entities choose to receive USWC customer record information, they must apply the same CPNI access and use security to this data. Reports/data must be stamped to indicate they were developed with only unrestricted CPNI.</i></p> <p align="center">*NOTE</p> <p>Colorado and Oregon state ONA orders require customer authorization to release their CPNI to our affiliated companies.</p> <p>With regard to NewVector, under the FCC rules, we may not release customer record information unless the customer has specifically authorized the release to them and to other cellular providers.</p> <p>Within U S WEST, we handle the sharing/selling of information/service via the Affiliate Transaction Rules plan to ensure the rate payer of regulated services does not subsidize any unregulated activities of U S WEST.</p>
<p>Sharing market/customer research</p>	<p>Market research that does not start with USWC customer data may be shared between regulated and unregulated USWC entities. Part 64 accounting should be applied to the sharing of research conducted by one group and shared with the other.</p> <p>Research shared between U S WEST regulated and unregulated companies must apply the Fair Compensation Plan to assess the value of the asset/information. Information about the Fair Compensation Plan can be directed to Maggie Barrington, Chair of the Fair Compensation Committee.</p>

**U S WEST Communications, Inc.
Regional Policy and Procedures**

RPP 1005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 6. Compliance

6.01 OVERVIEW

The FCC CPNI rules prohibit access to CPNI-restricted customer records by "enhanced services or CPE" marketing employees. The rules are implemented via mechanized security, methods and procedures, and business unit bulletins. Compliance is each employee's responsibility. U S WEST conducts periodic and regularly scheduled audits to assess company compliance with the FCC rules.

6.02 ANNUAL AUDITS

U S WEST conducts periodic ONA/CPE Compliance audits, to check the company's compliance with all the FCC ONA/CPE guidelines. CPNI protection is a significant part of the audit. The audit will focus on:

- Employee understanding of CPNI rules
- System user ID assignments
- Validation of customer record CPNI status with customer authorization on file in the Vendor Service Center (VSC)

Any discrepancies found in the audit must be corrected immediately, and procedures established to prevent such discrepancies from reoccurring.

6.03 PERIODIC AUDITS

Vendor Service Center (VSC)

The VSC conducts quarterly operations reviews to assess the validity of the CPNI status on customer records relative to customer authorization on file. Any discrepancies are corrected, based on the documentation on file.

The VSC also will periodically conduct on-the-spot audits with vendors who have a Blanket Authorization Agreement on file and request customer-specific CPNI. Such an audit is conducted when there is reason to question the vendors' authority to access the customer's records.

Market Unit

The market units' line organizations will conduct semi-annual reviews of system user ID's to ensure "enhanced service/CPE" employees are prohibited from access to CPNI-restricted customer records.

**U S WEST Communications, Inc.
Regional Policy and Procedures**

RPP 1005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 7. Glossary

AGGREGATED CPNI

Aggregated CPNI is a collection of customer-specific customer record information (CPNI) which is combined so that individual customers cannot be identified. Aggregated CPNI is a term that applies to such summary information about a specific class or category of customers, regardless of their unlisted, non-published or CPNI status.

(Summary data derived from unrestricted USWC customer records only is not affected by the aggregated CPNI rule.) -

Aggregated CPNI used in the planning, selling or marketing of U S WEST enhanced services or CPE must be available to all external enhanced services providers (ESPs) and CPE vendors under equal terms and conditions such as at the same time.

CPNI COORDINATOR

A business unit CPNI subject matter expert and point of contact to request customer record information from unsecured USWC databases. This role is a "network only" position, where the individual has no involvement with the planning, marketing, or sale of any unregulated product.

The CPNI Coordinator ensures against the passage of restricted customer information, in the absence of such controls in the systems. Restricted customer information includes restricted CPNI, unlisted and non-published customer information and any CPNI that identifies the competitor provider of enhanced services to our customers.

**CPNI/COMPLIANCE
METHODS MANAGER**

A methods manager in each market unit who implements and facilitates ONA/CPE CPNI safeguards that apply to deployment of enhanced services. Specifically, this individual works with the U S WEST CPNI Compliance Manager to ensure current CPNI regulatory requirements/modifications are incorporated into business procedures.

These managers ensure methods are written and issued to all business offices/sales channels for employee education and reference purposes. They manage CPNI compliance issues within the sales and marketing channels, and may conduct training of CPNI safeguards.

CUSTOMER PROPRIETARY
NETWORK INFORMATION -
CPNI (Cont.)

Some specific CPNI items are:

- location/termination point for services
- the type of network services billed to the customer
- number of lines
- billing information
- quantity, length of calls
- usage information
- telephone numbers called (calling patterns)
- intrastate toll - numbers called, charges
- bill summary
- carrier PIC
- traffic studies (e.g., TDRS-- Traffic Detail Report Studies)
- call detail - SMDR - Station Message Detail Recording

The following information, which also is contained in customer service records, repair order, service orders and customer contracts, is not considered CPNI:

- customer name*
- address*
- telephone number
- credit information
- information about U S WEST enhanced services or CPE products
- SIC (Standard Industry Code)
- MCN FID

*** NOTE**

Colorado state commission ONA order includes
billing name and address as CPNI.

"ENHANCED SERVICE
AND/OR CPE" EMPLOYEES

U S WEST employees with responsibility for/involvement in planning, marketing, or sale of enhanced services or CPE.

ENHANCED SERVICES

Services offered over common carrier transmission facilities (such as U S WEST's network) which:

- use computer processing applications that act on the format, code, protocol or similar aspects of the subscriber's transmitted information,
- provide the subscriber additional, different, or restructured information, or
- allow subscriber interaction with stored information

Enhanced services is a general term for alarm and security services, information services, telemessaging services and other types of services that are provided via some type of processing capability or storage and retrieval capability.

ONA

Open Network Architecture - a business concept and regulatory framework developed by the FCC. It enables U S WEST to offer enhanced services under specific rules structured to ensure competitive fairness and equal access to basic network services by all providers of enhanced services.

These rules include:

- customer record (CPNI) protection
- no subsidization of unregulated activities with regulated rate payer dollars (Part 64 accounting)
- advance disclosure of new or changed network interfaces
- no preferential treatment of our own enhanced service operations over competitors
- development of network services at the request of enhanced service providers (ONA services)

PASSWORD/ID SECURED
SYSTEMS OR DATABASES

Databases that have mechanized security to ensure enhanced services and CPE marketing employees are denied access to "CPNI-restricted" customer records. These systems require a special user ID to obtain access to the system. The user ID serves to identify whether the employee is an "enhanced services/CPE" marketing employee, or a "network only" representative. Also called CPNI-secured.

The systems with mechanized security for CPNI protection are the "primary" databases/systems used by marketing personnel that contain comprehensive customer record information: BOSS, CARS, CORD, SONAR, SOPAD, SOLAR.

REGULATED

Means subject to FCC regulation (and usually state, too). The classification subjects network services to federal and state regulatory requirements, such as tariffing and submission of costs analysis. These products/services' revenues and costs comprise the "rate base" used for ascertaining our allowed rate of return in each regulatory jurisdiction. When any of these network services are used in the offering of a U S WEST enhanced service or CPE product, that same network service must be available to competitor ESPs or CPE providers under the same terms and conditions.

RESTRICTED CPNI

The status of a customer's account when the customer chooses to restrict their network service information from U S WEST employees who plan, market, or sell enhanced services or CPE. This restriction status is noted in the Proprietary Classification field identifier (PCL FID) on the customer service record.

Distribution Update & Request for Printed Material

RG 13-0051
(1-92)

**SEND COMPLETED FORM TO: CDC - Room S-50, 1005 17 St.
Denver CO 80202 Fax (303) 965-2649**

PLEASE PRINT

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RC	GEO	JFC	EC
Name			
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Check appropriate box(s)

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| <input type="checkbox"/> Add to Mailing List | <input type="checkbox"/> Request for printed material |
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PRISM

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| <input type="checkbox"/> List Management | Initials _____ Total time _____ |
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CENTRAL DISTRIBUTION CENTER (CDC)

- | | |
|--|---------------------------------|
| <input type="checkbox"/> Scheduling | Initials _____ Total time _____ |
| <input type="checkbox"/> Pulling, Refilling & Boxing | Initials _____ Total time _____ |
| <input type="checkbox"/> Labeling | Initials _____ Total time _____ |

TOTALS

PRISM - LIST MANAGEMENT: _____
TOTAL NUMBER OF LABELS: _____
CDC: _____

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PAGE

**ONA COMPLIANCE
NON STRUCTURAL SAFEGUARDS
& OPERATIONAL REQUIREMENTS
ENHANCED SERVICES / CPE**

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ONA COMPLIANCE

NON STRUCTURAL SAFEGUARDS & OPERATIONAL REQUIREMENTS - ENHANCED SERVICES/CPE

REFERENCE

FCC Docket 88-2 U S WEST Open Network Architecture Plan (2-01-88)
FCC Docket 86-79 CPE Non-Structural Safeguards (6-29-88)
FCC Docket 90-623 Computer III Remand Proceedings (12-20-91)
US WEST Communications Compliance Training ONA/CPE (4-10-89)

SUMMARY

This reference will provide you with the specific responsibilities and procedures required to comply with FCC mandated "non-structural safeguards" surrounding the sale of Enhanced Services and Customer Premises Equipment (CPE).

BACKGROUND

FCC Docket 86-79 enabled U S WEST to sell CPE without forming a separate subsidiary to do so. CPE is defined as hardware located on customer premises that includes telephone sets, modems, PBX's, facsimile machine, etc.

In response to the FCC's Computer III proceedings, U S WEST filed with the FCC its Open Network Architecture (ONA) plan. Compliance with the ONA plan allows U S WEST to sell a voice messaging service without forming a separate subsidiary to do so.

BVMS is an enhanced service. Prior to the approval of our voice messaging plan, U S WEST Communications (and its associated market units) was prohibited from selling enhanced services. Enhanced services are services in which computer processing changes or modifies the data or information passed over the network or allows interaction with stored information. Enhanced services differ from basic (i.e., network) services in one fundamental way: a basic service moves information across the network; an enhanced service allows changes to the information that is being moved over the network or allows interaction with information that has been stored. Let's use BVMS as an example:

A basic service, Call Forward/Don't Answer, moves the information (the call) from the unanswered or busy number to another number. The enhanced service, BVMS, takes the call that has been moved, answers it, stores it, distributes it, and allows interaction with the stored message.

REQUIREMENTS

There are a number of requirements that U S WEST must comply with in order to sell CPE and enhanced services. Most pertinent to the sales environment are the requirements called "non-structural safeguards". Non-structural safeguards are rules that ensure that U S WEST (and other RBOC's) will not leverage its market power to obtain an unfair advantage in the offering of enhanced services or CPE.

Each and every employee involved in the planning, marketing, and/or sale of enhanced services/CPE must clearly understand the FCC mandated requirements and U S WEST policies listed below:

- **ONA Service Requirements - for enhanced services sales (not CPE)**
- **Customer Proprietary Network Information (CPNI)**
- **Treatment of Non-Published/Non-Listed Numbers**
- **Treatment of Call Forwarded - To Numbers - for enhanced services sales (not CPE)**
- **Non Discriminatory Provisioning**
- **Compliance With Security Procedures**

ONA SERVICE REQUIREMENTS FOR ENHANCED SERVICES

ONA services are unbundled basic network capabilities required by enhanced service providers (U S WEST or external) that enable delivery of that service over the U S WEST network. ONA services are available to all customers on equal terms and conditions. Examples of these unbundled services are Call Forward Busy/Don't Answer and Message Waiting Indication. Unbundled means that they may be purchased as stand alone features.

You must clearly understand that customers may purchase ONA services from U S WEST directly to be used as stand alone features, as a component of an enhanced service provided by an external enhanced service provider, or as a component of a U S WEST enhanced service (i.e. BVMS). The customer - and the customer can be any individual or company including U S WEST will always purchase ONA services for the same price and under the same terms and conditions, no matter what the service is ultimately used for.

In addition to understanding that all customers will receive equal treatment, you must also be aware that customer enhanced service will order these services to be enhanced service providers. Those external enhanced service providers will at times be U S WEST competitors.

When a customer calls to order a Call Forwarding service in order to subscribe to an external enhanced service provider's product, you **MAY NOT** attempt to sell our enhanced service products instead. You may offer additional services. If it is not apparent what the customer is using their forwarding service for, you may consult with the customer to determine if they are using call forwarding to hook up to a competitor's service. If they are not, you can sell our enhanced services products.

IMPORTANT

U S WEST IS COMMITTED TO, AND FULLY SUPPORTS THROUGH ITS ONA PLAN, COMPETITIVE AND NON-COMPETITIVE USE OF ITS NETWORK THROUGH THE PURCHASE OF ONA SERVICES.

CUSTOMER PROPRIETARY NETWORK INFORMATION - CPNI

CPNI is information collected by U S WEST in connection with providing network services to a given customer. These are two types of CPNI - customer specific CPNI and aggregated CPNI.

Customer specific CPNI is any basic service network information, in any form, pertinent to an individual customer. If you are involved in the sale of enhanced services or CPE, it is critical that you understand how CPNI affects your contact with our customers.

Aggregated CPNI is a summary of customer network services information. The identity of specific customers is unknown.

CUSTOMER SPECIFIC CPNI

Customer specific CPNI includes information such as the type, quantity and location of network services billed to an individual customer. **It is NOT name*, address*, telephone number, credit information, or information regarding U S WEST enhanced services and CPE.** Customer specific CPNI can be found in customer services records, repair records, and service orders.

Examples of customer specific CPNI are (but not limited to):

- Local or Toll Usage
- Quantity/Type of Network Services
- Location of the lines/circuits
- Type of lines/circuits (Class of Service)
- Number of lines/circuits at a business/residence

- Billing Information (* Colorado only - BN and BA is CPNI)

Basically, any record regarding a specific customer that contains information regarding network services is customer specific CPNI.

AGGREGATED CPNI

Aggregated CPNI is a collection of customer specific CPNI which has been sufficiently combined so that specific customers cannot be identified.

Current publicly available aggregated CPNI includes:

- Number of lines/circuits by business/residence
- Average call duration
- Average number of messages
- Average minutes of use
- Number of lines with touch tone

Any aggregated CPNI used for planning or marketing of enhanced services/CPE must be made available on equal terms and conditions to external enhanced service/CPE providers. Normally a sales office would not have a need to obtain aggregated CPNI. However, should the need arise to use aggregated CPNI for the purpose of marketing and product planning for an enhanced service/CPE SBS managers should call Janet Brides 303 896-0885, or BGS managers, Paul Millen 402 422-7599. If you get a request for aggregated CPNI from an external enhanced services/CPE provider the information can be obtained by calling the InterConnect Service Center CPNI Coordinator at 800 544-7126.

PROPRIETARY CLASSIFICATION FID

A FID - PCL is used in the unfielded ID section of the customer record to indicate specific CPNI information. PCL may be followed by the data "ONA", "ALL", "CPE" "21C", or "NON".

IF PCL IS:	THESE MARKETING SALESPERSONS ARE BLOCKED:
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ONA	Enhanced Services
CPE or 21C	CPE
ALL	Enhanced Services and CPE
NON	No One

ONA COMPLIANCE

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04-10-95

The PCL FID is entered or changed only by the InterConnect Service Center, except on N orders with 21+ lines on that order. Those N orders must have a PCL ONA on them when they are issued.

NOTE: NON PCL is only used when the customer notifies us in writing to unrestrict the account.

CUSTOMER SPECIFIC CPNI RIGHTS NOTIFICATION

One of the FCC mandated requirements surrounding customer specific CPNI is that U S WEST must notify multi-line business customers of certain rights that those customers have regarding the handling of their CPNI.

U S WEST sends a bill insert (Exhibit 1) annually to all business customers listing the customers options. This practice began in July 1988. A response form is attached to the insert should a customer wish to utilize those options. The customer may opt not to respond.

The customer may authorize U S WEST to:

- Release CPNI to a specific external vendor or to all vendors.
- Restrict CPNI from U S WEST enhanced service or CPE sales personnel (i.e. an employee selling BVMS or CPE).
- Change any previous release or restriction of CPNI.

The customer may release or restrict their CPNI at any time as long as it is in writing to U S WEST. The annual notification sent by U S WEST serves the purpose of reminding existing customers of their rights, as well as advising any new customers who may not be aware of their rights.

Customer responses are collected in the InterConnect Service Centers.

CPNI RESTRICTION OF 21+ LINE ACCOUNTS

Per FCC docket 90-623, the FCC mandated that beginning in June 1992 customers who have 21 or more lines either at one location or at multiple locations, be CPNI restricted from U S WEST enhanced services (not CPE) personnel unless we have written permission from the customer.

If a 21+ line customer does not want to be restricted, written authorization is required. The orders will be issued by the InterConnect Service Center. From now

on, when any (regardless of the size) customer notifies us in writing that they do not want to be CPNI restricted, a service order will be issued by the InterConnect Service Center to add a FCL NON to the account(s).

N orders taken with 21+ lines (on that order) must be CPNI restricted until we receive written authorization from the customer to unrestrict the account. Put a IPCL ONA on the order (Central Region PCL ONA).

Explain the CPNI restriction while negotiating the N order. You must also:

- Within 30 days mail the customer a copy of the CPNI bill insert form.
- If the customer chooses to be unrestricted they must return the form to the InterConnect Service Center and the center will issue the order to change the PCL to NON when they receive the written notification.

We may not initiate a discussion about enhanced services while negotiating that N order. However, if the customer initiates the discussion we may sell the enhanced service. Put a retained remark on the N order to indicate that the customer initiated the discussion. Be sure to put the PCL ONA on the order.

Each year we will identify any customers who are new or who may have grown to 21+ lines. We will go through the notification process and restrict accounts as appropriate via a CRIS spin.

If you are dealing with a customer that has grown to 21+ lines since that last CRIS spin you may discuss the CPNI restriction requirements if you know the customer will be included in next years spin. If you choose to have this discussion with the customer, explain the customer's options in an unbiased manner and send the notification so the customer can respond before the annual notification. For example:

- explain the ramifications if the customer chooses to restrict the account.
- we will not be able to advise the customer about new enhanced services or CPE.
- we will not be able to consider enhanced services and CPE when consulting with customers to develop solutions to customers communications problems.
- the Account Manager may need to be reassigned if the current Account Manager sells enhanced services/CPE.

RESTRICTED CPNI

Customers may restrict their CPNI from U S WEST enhanced services or CPE personnel. This means that those persons will not be able to utilize restricted CPNI for any reason.

Our primary systems - BOSS, SONAR, SOPAD, SOLAR, CARS, CORD and EDGE* will mechanically block restricted records from enhanced services/CPE salespeople. See System Instructions for details.

* Due to the fact that EDGE is updated monthly, there may be accounts that become restricted between the updates, because of this EDGE users must always check BOSS/CARS prior to accessing an account.

CUSTOMER CONTACT HANDLING

Whenever a customer record cannot be retrieved because it is CPNI restricted, there are two things you must be alert to:

1. **DO NOT** attempt to sell enhanced services/CPE to the customer. It is reasonable to assume that the customer does not want an enhanced service/CPE from U S WEST or they wouldn't have restricted their records.
2. **REFER** the customer to a "network only" salesperson. Most customer requests cannot be handled without looking at or changing the customer record or bill. "Network Only" means an individual not involved in the sale of enhanced services or CPE.

The number of network only personnel required to service customers who have restricted CPNI is entirely dependent on the frequency of attempts to access restricted accounts. The following sample referral is appropriate whenever a CPNI restriction message is received:

"You have requested that U S WEST employees that sell enhanced services and telephone equipment not be allowed access to your records. I sell those services, so I'm going to refer you to someone who is authorized to view your account."

Any verbiage that conveys the following is sufficient:

- The employee speaking to the customer is denied access because he/she is an enhanced services/CPE salesperson.

- The customer will be helped as quickly as possible and will receive the same attention and level of service we always provide, regardless of the CPNI restriction.

NOTE: Network only personnel may not initiate a discussion about U S WEST CPE or enhanced services products, nor can they advise a customer that U S WEST sells such services, even if the account is not CPNI restricted. These people may not be involved in any type of enhanced service/CPE sales activity including active referrals or sales leads to enhanced services/CPE personnel. If the customer initiates the discussion, a referral must be made to an enhanced services/CPE salesperson.

Example: Customer calls and places N order with a network only salesperson. At the end of the contact the customer says "... by the way, I saw an advertisement for your voice messaging services/CPE, can you tell me about it?" The network only salesperson explains that he/she is not able to sell that service but can transfer the customer to someone who can. The call is transferred to an enhanced services/CPE salesperson and the BVMS/CPE is sold.

NOTE: Once the customer has advised the network only person that they are interested in BVMS - do not enter into a discussion about call forwarding features and how they work with BVMS.

Example: An **unrestricted** customer calls into a network only salesperson to add an additional line. The customer already has BVMS. The network only salesperson can sell the additional line and call forwarding feature. When discussing the call forwarding feature the network only salesperson can say "where would you like your calls on this new line to be forwarded to when you don't answer or the line is busy?" If the customer says to their BVMS mailbox then the network only salesperson would need to explain that she/he is not able to sell additional BVMS services but can transfer the customer to someone that can. The call is transferred to an enhanced services salesperson and the BVMS feature is sold.

The enhanced services/CPE salesperson may add the appropriate enhanced services/CPE order entries to the network only salesperson's order. The enhanced services/CPE salesperson's sales code **must** shown behind the enhanced services/CPE order entries.

IMPORTANT: Please use BOSS/CARS notes (or a remark on the N order) to indicate that the **customer initiated** the discussion so it does not appear that the network only salesperson initiated the discussion and therefore provided a sales referral/lead to the enhanced services/CPE salesperson.

CPNI-RESTRICTED CUSTOMER INITIATES DISCUSSION ABOUT ES/CPE

If a customer initiates a discussion about enhanced services or CPE and the account is CPNI restricted, you must:

- **EXPLAIN** that you do not have access to the customer's account because the customer requested that U S WEST employees that sell enhanced services/CPE (whichever is appropriate) not be allowed access to the account.

NOTE: **This explanation is extremely important. Be sure the customer understands that you can't see the records.**

- **EXPLAIN** that you would be happy to provide the customer with information about the service but you will be doing so without access to their account.

If a customer initiates a discussion about enhanced services or CPE and the account is CPNI restricted, the enhanced services/CPE representative **MAY**:

- talk about enhanced services/CPE features
- discuss rates if the customer requests them
- mail brochures/literature
- respond to specific questions the customer asks

If you do get involved with a customer who initiates a discussion about enhanced services or CPE and has a restricted account, it is important to make notations on the account for future reference in case there is a question about why you were discussing enhanced services/CPE with a CPNI restricted customer. Since you do not have access to the account, give a note to a network only employee to make the notation for you.

The notation should include your name, the customer name, date, and that the customer initiated the discussion. Also, indicate what you discussed or mailed to the customer.

For **enhanced services** sales, you **MAY NOT** close the sale and place an order for the service until the customer sends written authorization to unrestrict their account.

For CPE sales, you **MAY** close the sale and order the service. If the restricted customer requests CPE and network services, the customer will need to discuss their network services with a network only employee who has access to their account and the CPE with a CPE sales employee.

When CPE is sold on a restricted account, a record order to change the MCN FID needs to be issued by a network only employee with access to the account. In addition, a permanent notation is placed in BOSS/CARS to indicate what was sold and when.

IMPORTANT: Be sure the customer is aware that you recognize and honor CPNI restrictions and that you do not have access to the records.

Under no circumstances may U S WEST enhanced services/CPE employee initiate a discussion about enhanced services/CPE with a CPNI restricted customer.

CUSTOMER REQUESTS CHANGE OF RESTRICTION STATUS

A customer may not understand why their account is restricted from you. Explain that we send a bill insert (Exhibit 1) out annually and that the customer could have responded to the insert or that the customer's vendor/enhanced service provider may have asked them to sign a similar kind of form. The customer may have 21+ lines and may have automatically been restricted from enhanced services personnel.

Some customers believe that the form will keep them off lists for sales calls of all kinds, so you may need to further explain the purpose of the restriction.

If the customer wishes to remove the restriction, advise the customer you will send a copy of a form (Exhibit 2) that may be used to remove the restriction.

NOTE: If you sell CPE and enhanced services the customer will need to authorize access to U S WEST personnel involved in both, since your user ID's will restrict you from any account with a PCL FID, except PCL NON.

If the customer wants to buy enhanced services but wants to keep the account restricted you will need to request that the customer remove their restriction temporarily -- long enough to get their service in and working.

All the billing telephone numbers must be shown on the form that are to have the restriction removed.

The form must be sent by the customer to the CPNI Coordinator in the InterConnect Service Center that serves your state. The customer may FAX the form to the appropriate InterConnect Service Center listed below:

CPNI COORDINATORS

<u>STATE</u>	<u>INTERCONNECT CENTER</u>	<u>FAX</u>
Arizona	U S WEST Communications CPNI Coordinator Room 250 202 E Earll Phoenix AZ 85012	602 235-3333 or 800 622-2491
Colorado	U S WEST Communications CPNI Coordinator Room 990 1005 17th Street Denver CO 80202	303 965-2552 or 800 772-1892
Utah Idaho Montana Wyoming Washington	U S WEST Communications CPNI Coordinator 2nd Floor 1915 Terry Avenue Seattle WA 98191	206 345-6707 or 800 927-6707
Oregon	U S WEST Communications CPNI Coordinator Room 6S01 421 SW Oak Street Portland OR 97204	503 242-6491 800 232-6491
Iowa Minnesota Nebraska New Mexico North Dakota South Dakota	U S WEST Communications CPNI Coordinator 9th Floor 200 S 5th Street Minneapolis MN 55402	612 663-6152 or 800 328-1874

The InterConnect Service Center will process the customer's request as soon as it is received. The order to change the PCL FID should post in 3-5 days and you may then access the account. If there is a delay in the order posting and you can tell from the BOSS/CARS notes that a form has been received or you have a copy of the customers written request to unrestrict the account you may get a copy of the record from a network only representative and issue your order. If the customer sends their request directly to you, make a copy of the written authorization for your files or to attach to the order before you forward it on to the InterConnect Service Center.

CHANGE OF RESPONSIBILITY ON CPNI RESTRICTED ACCOUNTS

The restriction status on the account of the outgoing subscriber should not carry forward to the new owner. If the new owner wishes CPNI restriction, they must send written authorization to do so. The form to add the CPNI restriction will be sent to the InterConnect Service Center. In CORD, SOPAD, and SOLAR you will need to out or delete the PCL FID. SONAR will automatically remove the PCL FID when you choose CHANGE RESPONSIBILITY on the NEGOTIATION MENU. If you use a different order flow in SONAR, you must remove the PCL FID and data.

Customers that have 21+ lines billed on one account will follow 21+ line New Connect procedures. You will need to put a PCL ONA on the account, mail the customer a copy of the CPNI bill insert, and explain the CPNI restriction.

PROVIDING CPNI TO U S WEST COMMUNICATIONS SERVICES EMPLOYEES

U S WEST Communications Services employees (i.e. TIPS product managers) may have access to unrestricted customer records. This access may be in written or verbal form. Included are service orders, CSR's billing information, etc.

Action required before releasing CPNI to USWC's:

- Check CSR for a PCL - it should appear in the unfielded ID section of the CSR.
- If PCL appears and the data "CPE" or "ALL" follows the FID, the record is restricted from USWC's employees. The only information that may be given is confirmation of name*, address*, or telephone number.
 - * Colorado only - we cannot give BN & BA from CPNI restricted accounts.
- If the record is restricted, explain to the USWC's employee that the customer requested their records be restricted from U S WEST employees involved in the sale of CPE.

NOTE: PCL followed by "ONA" means the record is restricted from U S WEST employees involved in the sale of enhanced services. The records may be released to USWC's personnel.

PROVIDING CPNI TO VENDORS/ENHANCED SERVICE PROVIDERS*

Vendors/Enhanced Service Providers* may request customer account information (CPNI). You may choose to:

- Refer the Vendor/Enhanced Service Providers to the InterConnect Service Center or,
- Verify with the InterConnect Service Center that the Vendor/Enhanced Service Provider has a Blanket Authorization Agreement/Letter of Agency on file. If not explain we are not allowed to release CPNI without the customer's written permission or,

- Three way call the customer and Vendor/Enhanced Service Provider on line with you to release CPNI. You cannot release a paper copy of the customer's CPNI without written authorization.
- * We also consider our third party agents (TIE, Mr. Cellular, and Innotrac) that sell our enhanced services/CPE as vendors/ESP's and the above rules apply. You cannot provide a customer's CPNI to these agents without the customer on the line or written authorization.

NOTE: Refer Vendors/Enhanced Service Providers to the InterConnect Service Center for further instructions on Letters of Authorization.

TREATMENT OF NON-PUBLISHED/NON-LISTED NUMBERS

Any lists of customers used for the purpose of initiating the sale of an enhanced services may not contain non-published or non-listed telephone numbers. If you need to generate a list of customers for the purpose of selling enhanced services, CPE or any other product or service please contact your market unit CPNI Coordinator, SBS Janet Brides 303 896-0885, or BGS Paul Millen 402 422-7599.

TREATMENT OF CALL FORWARDED TO NUMBERS

The FCC mandated that the pre-programmed call forwarded-to numbers (CFN's) that appear on the customer's account be blocked from U S WEST enhanced services employees. This includes the CFN number associated with Market Expansion Lines. This blocking is to prevent identification of the customer's enhanced service provider, and any attempt to unhook the customer from the other provider.

When an unrestricted account is accessed by an enhanced services salesperson a check is done to determine if a call forwarding USOC followed by the FID CFN appears. If so, CARS, CORD, BOSS, SOLAR, SONAR, and/or SOPAD will return the CSR with the data behind the CFN masked. Asterisks will appear in place of the telephone number.

EXAMPLE: EVF/TN 222-1234/CFN ***-****

The generation or use of customer lists for the purpose of selling enhanced services if that list contains the CFN FID and associated telephone number is also prohibited.

EXCEPTIONS

ENHANCED SERVICES SALESPERSONS MAY HAVE ACCESS TO THE CFN NUMBER ASSOCIATED WITH A CALL FORWARDING USOC WHEN IT IS USED FOR U S WEST BVMS, IN LIEU OF INTERNAL HUNTING, FORWARDING CALLS TO A RESIDENTIAL NUMBER, OR FORWARDING CALLS TO THE CUSTOMER'S OTHER BUSINESS TELEPHONE NUMBERS AT THE SAME OR ANOTHER ADDRESS. THE ENHANCED SERVICES SALESPERSON MAY OBTAIN THE DATA FROM A NETWORK ONLY SALESPERSON.

When the call forwarding USOC is used for U S WEST BVMS, please show the call forwarded-to-number on your service order in a permanent remark, in addition to having it floated behind CFN. This will make it easier to obtain the number after the order is released.

When the call forwarding busy line - overflow USOC EVO is used for internal hunting purposes we may have access to the hunting sequence. Internal hunting is defined as hunting if the line is busy for the same customer on the same account. This will also apply to call forwarding busy line - overflow/don't answer USOC's EVK, and EV2.

EXAMPLE: I1 EVO/TN XXX-XXXX/CFN ***-****/DES HTG TO XXX-XXXX

When the call forwarding feature is used to forward calls to a residential number or to forward calls to the customer's other business telephone numbers at the same or a different location.

EXAMPLE: I1 EVF/TN XXX-XXXX/CFN ***-****/DES CF TO XXX-XXXX

DO NOT SHOW ANY OTHER TYPES OF CALL FORWARDED-TO-NUMBERS ANYWHERE ON THE CUSTOMER RECORD EXCEPT BEHIND THE APPROPRIATE CFN FIDS ON THE SERVICE ORDER. ALL OTHER CFN NUMBERS MUST BE BLOCKED FROM THE VIEW OF BVMS SALES PERSONNEL.

NON-DISCRIMINATORY PROVISIONING

Another FCC mandate states that US WEST must not discriminate between "affiliated" and "non-affiliated" enhanced services/CPE providers when it comes to the installation and maintenance intervals for network services. A sales channel that sells enhanced services/CPE is considered to be affiliated while an external enhanced service/CPE provider is non-affiliated. You may NOT expedite a customer's network services order (i.e. 1FB) because the customer purchased enhanced services/CPE from you.

In order to demonstrate our commitment to non-discrimination, U S WEST provides quarterly reports containing pertinent installation and maintenance intervals to the FCC. The FID MCN (Master Customer Number) is the vehicle used to provide those reports. MCN appears in the BILL section of the customer records.

The first character of the data behind MCN must be "A" when the service order has CPE on it to indicate that U S WEST is the CPE provider.

The second character of the data behind MCN must be "A" when the service order has enhanced services on it to indicate that U S WEST is the enhanced service provider.

The MCN characters will stay "A"s until the customer removes their enhanced service or volunteers they have removed all their U S WEST CPE. It is important to remove the "A" character in the first (CPE) position only if the customer volunteers they have removed all their U S WEST CPE. We are not to initiate this discussion.

If you can tell by looking at the account that the customer has our enhanced services or CPE, it is appropriate to correct the characters from "X's" to "A"s.

SYSTEM INSTRUCTIONS

Prior to selling enhanced services or CPE, the appropriate systems, BOSS, SONAR, SOLAR, SOPAD, CARS, CORD, and EDGE must be updated to indicate that the user is an ES/CPE user type. No system updates are required for network only personnel. (Network only personnel are those individuals **NOT** involved in the sale of enhanced services or CPE.)

Attachment A has detailed information about BOSS, CARS, CORD, SOLAR, and SONAR, and SOPAD user ID updates and error messages. EDGE users should refer to their EDGE methods for details on user ID restriction.

SEMI ANNUAL REVIEW OF USER ID'S IN ALL SYSTEMS IS REQUIRED. LOCAL MANAGEMENT IS RESPONSIBLE FOR CONDUCTING AND DOCUMENTING THE REVIEWS.

OTHER SYSTEMS

There are other systems that may be accessed that do not mechanically protect customer restricted records or CFN numbers. Obvious examples are LMOS, PREMIS, OSCAR, CRIS, RMDS, BART, MARCH, and FACS. PREMIS records may always be accessed by enhanced services/CPE employees because PREMIS records pertain to addresses, not customer specific CPNI.

LMOS, FACS, RMDS, OSCAR, BART, CRIS, and MARCH or any other system that contains customer specific CPNI may **NOT** be accessed by enhanced services/CPE employees unless an attempt to access the account from a secured system has been made first, this includes making copies of accounts on microfiche. If you keep paper records on accounts for over 30 days a check must be made to verify that the customer has not restricted their account before viewing the paper records. If such an attempt is made and the account can be retrieved through CARS, CORD, BOSS, SOLAR, SONAR, or SOPAD, then the enhanced services/CPE salesperson may also access the account through LMOS, OSCAR, FACS, BART, MARCH, CRIS, or RMDS. If the account is restricted or has a blocked CFN number on it, and cannot be retrieved through CARS, CORD, BOSS, SOLAR, SONAR, or SOPAD, the enhanced services/CPE salesperson may **NOT** attempt to access it through a unsecured system.

IT IS NOT ACCEPTABLE TO ACCESS ANY UNSECURED SYSTEM WITHOUT FIRST DETERMINING WHETHER OR NOT THE CUSTOMER'S ACCOUNT IS CPNI RESTRICTED OR HAS A BLOCKED CFN NUMBER ON IT.